

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

JAKE W. GRAHAM,

Plaintiff,

vs.

PRUDENTIAL PROTECTIVE SERVICES,
LLC., a Michigan limited liability
corporation, PRUDENTIAL DEFENSE
SOLUTIONS, INC., a Delaware
corporation, PRUDENTIAL SECURITY,
INC., a Michigan corporation, PATRICK
KAKOS, individually, PATRICIA GUZIK,
individually, GREG WIER, individually,
and MATTHEW KEYWELL, individually.

Defendants,

No. 1:20-cv-00002

Judge Virginia M. Kendall

Magistrate Judge M. David Weisman

PLAINTIFF'S MOTION TO FILE *INSTANTER*

Plaintiff, by and through counsel, moves to file *instante* its response in opposition to *Defendants' Joint Motion to Dismiss This Action Pursuant to Federal Rule of Civil Procedure 13(a)*, or, *In The Alternative, To Transfer This Action to the United States District Court of the Eastern District of Michigan*, Docket No. 21, as follows:

1. Defendants filed the aforementioned joint motion on March 2, 2021. (Dkt. 12)
2. Plaintiff's deadline to respond to Defendants' motion was March 19, 2021.

3. That deadline could not be achieved when a family emergency required counsel to travel out of state on March 19, 2021, and attempts to finalize Plaintiff's response while traveling failed due to technology constraints and time.
4. This delay of one business day was for good cause and without intent to delay the administration of justice.

WHEREFORE, Plaintiff prevails upon the court to grant Plaintiff leave to file Plaintiff's Response to Defendants' Motion to Dismiss *instantly*, and, grant Defendants equivalent additional time such that Defendants' deadline to reply is **March 29, 2021**.

Respectfully submitted,
Jake W. Graham,
Plaintiff,

By 
One of Plaintiff's Counsel

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CERTIFICATE OF SERVICE

I, Lisa M. Stauff, and attorney, certify and attest that the attached documents were served upon all parties of record by the Court's CM/ECF System, at the time of filing.

/s/ Lisa M. Stauff_____

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